

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Debtor(s)

Chapter 13

Lakeview Loan Servicing, LLC
Movant
V.

1:17-bk-01806-HWV

Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Respondent(s)

Answer

Charles J. Dehart, III
Trustee/Respondent

ANSWER

AND NOW, this 8th day of December 2019, the Debtors, Cynthia Ann Schmidt and Woodrow Paul Schmidt JR, by and through counsel, Dawn M. Cutaia, file this Answer to the Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. By way of further answer, Debtors suffered some unexpected expenses that caused them to fall behind but they are taking an emergency withdrawal from their 401(k) and will be able to pay the entire post-petition

balance once they obtain those funds. Debtors have already requested the funds.

8. Admitted.
9. Admitted.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the Motion for Relief to allow Debtors an opportunity to cure the arrears.

Respectfully Submitted,
By: /s/ Dawn M. Cutaia
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